EXHIBIT D Affidavit of Donna J. Charles

6546 Charles Field San Antonio, TX 78238 May 31, 2023

To Whom It May Concern:

Re: Denise Frederick

I wish to inform you of the derogatory treatment that I witnessed from Benny Martinez, Council Member, Leon Valley, toward Denise Frederick, City Attorney.

On more than one occasion during Council Meetings and Executive Sessions, Mr. Martinez belittled Ms. Frederick and was derogatory toward her in his responses. He questioned her knowledge and opinions as an attorney as if he knew more than she did. Ms. Frederick always remained in control and kept her tone of voice calm toward him. She always voiced a willingness to help clarify even as Mr. Martinez spoke over her conversations.

Although I cannot recall word for word what was said, I do recall that Mr. Martinez's comments were abrasive and derogatory toward Ms. Frederick and that he was unwilling to accept her offered help in working out problems.

I may be contacted at 210-236-8992 for additional comments or clarification.

Donna J. Charles
Former Council Member

ID No. 13400493-1